

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,**

Plaintiff,

and

**DEMETRIUS FORD,**

Intervenor Plaintiff,

v.

**CENTER ONE, LLC,**

Defendant,

and

**CAPITAL MANAGEMENT  
SERVICES, LP,**

Defendant.

Case No. 2:19-cv-01242-CCW

Hon. Christy Criswell Wiegand

**JOINT MOTION FOR ENTRY OF CONSENT DECREE**

Plaintiff U.S. Equal Employment Opportunity Commission; Intervenor Plaintiff Demetrius Ford (collectively, “Plaintiffs”); Defendant Center One, LLC; and Defendant Capital Management Services, LP (collectively, “Defendants”), respectfully move the Court for approval and entry of the attached Consent Decree (Exhibit 1). In support of the Motion, the parties state as follows:

1. Plaintiffs and Defendants have negotiated the attached Consent Decree as a resolution of Plaintiffs’ claims in the above-captioned case.

2. Plaintiffs and Defendants believe that the terms of the Consent Decree are adequate, fair, reasonable, equitable, and just.

3. Plaintiffs and Defendants believe that the Consent Decree conforms with the Federal Rules of Civil Procedure and is not in derogation of the rights or privileges of any person. The entry of the Consent Decree will further the objectives of Title VII of the Civil Rights Act of 1964, as amended, and will be in the best interests of the parties, those for whom EEOC seeks relief, and the public.

Date: October 23, 2024

Respectfully submitted,

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